

CHAITMAN LLP

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*Attorneys for Participating Claimants listed on
Exhibit A to Notice of Motion*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

DECLARATION OF HELEN DAVIS CHAITMAN

I, Helen Davis Chaitman, hereby declare as follows:

1. I am a partner with Chaitman LLP, counsel to the BLMIS participating claimants listed on Exhibit A to the notice of motion ("Participating Claimants"). I am a member of the bars of New York and New Jersey, and of this Court.

2. I submit this declaration in connection with the Participating Claimants' memorandum of law in support of their motion to strike the expert reports of Lisa M. Collura and Matthew B. Greenblatt regarding profit withdrawals.

3. Attached hereto as **Exhibit A** is a true and accurate copy of the Aaron Blecker's statement dated June 30, 1990 (MF00038708).

I declare that the foregoing is true and correct.

October 28, 2016

/s/ Helen Davis Chaitman
Helen Davis Chaitman

CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2016, I caused a true and correct copy of the foregoing document to be served upon the parties in this action who receive electronic service through CM/ECF and by electronic mail upon:

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LLC and the Estate of Bernard L. Madoff*

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